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9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA  
11 SAN FRANCISCO DIVISION

12 RICKIE JOHN GRATE, by and through his )  
Guardians Ad Litem, SANDRA TUCKER )  
and MARSHA D. LATNER, )

13 )  
14 Plaintiff, )

15 v. )

16 UNITED STATES OF AMERICA, and )  
DOES 1 through 100, inclusive, )

17 Defendants. )  
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Case No. C 04-5220 MEJ

**STIPULATION AND ~~PROPOSED~~  
ORDER FOR STANDSTILL PERIOD  
OF THIRTY DAYS ON CERTAIN  
PENDING CASE MANAGEMENT  
DEADLINES**

Following recent discussions between counsel of record, in order to foster settlement prospects between the parties at the upcoming settlement conference before Magistrate Judge Brazil on October 17, 2006, the parties have agreed to the following stipulation for a standstill period of thirty days on certain pending pretrial case management deadlines:

1. The deadline for designation of rebuttal experts is extended to November 6, 2006.
2. The close of fact discovery is extended to November 20, 2006.
3. The trial date and remaining pre-trial deadlines are not changed.

SO STIPULATED.

LAW OFFICES OF SEAN M. BURKE

DATED: October 2, 2006

By: //ss//  
SEAN M. BURKE  
Attorneys for Plaintiff

KEVIN V. RYAN  
United States Attorney

DATED: October 2, 2006

By: //ss//  
JONATHAN U. LEE  
Assistant United States Attorney  
Attorneys for Defendant

**ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: October 3, 2006

MARIA-ELENA JAMES  
United States Magistrate Judge

